



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



JUN 13 2016

Mr. Nazer Ali
Olam West Coast Inc
47641 W Nees Ave
Firebaugh, CA 93622

**Re: Notice of Minor Title V Permit Modification
District Facility # C-7748
Project # C-1161259**

Dear Mr. Ali:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC C-7748-21-1 (under project C-1161258) into the Title V operating permit. This ATC authorizes the installation of a dry vegetable processing operation served by four baghouses.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-7748-21-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

El Vj
for Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1161259

Engineer: Jesse A. Garcia
Date: June 3, 2016

Facility Number: C-7748
Facility Name: Olam West Coast Inc
Mailing Address: 47641 W Nees Ave
Firebaugh, CA 93622

Contact Name: Nazer Ali
Phone: (559) 256-6235

Responsible Official: Nazer Ali
Title: Director, Environmental Health and Safety

I. PROPOSAL

Olam West Coast Inc is proposing a Title V minor permit modification to incorporate recently issued ATC C-7748-21-1 (under project C-1161258) into the Title V operating permit. ATC C-7748-21-1 authorizes the the installation of a dry vegetable processing operation served by four baghouses.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The facility is located at 47641 W Nees Ave in Firebaugh, CA.

III. EQUIPMENT DESCRIPTION

C-7748-21-1: DRY VEGETABLE PROCESSING OPERATION SERVED BY FOUR BAGHOUSES CONSISTING OF: PNEUMATIC CONVEYING SYSTEM; A C4VA SEPARATOR, SIX ACCRODENT ROTORY SEPARATORS VENTED TO A SAUNCO 10-SIFT-100 BAGHOUSE; TWO DRYERS AND ONE BRUSH REELS VENTED TO A MAC 36FRB7 BAGHOUSE; SIX OLIVER GRAVITY SEPARATORS VENTED TO A BUHLER ASFB

BAGHOUSE; GRANULE PACKAGING LINE VENTED TO A MAC 36VR7-STY3 BAGHOUSE

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Authority to Construct (ATC) condition 1 is removed from the proposed permit as the condition is satisfied with this application.

ATC condition 2 is removed from the proposed permit as ATC C-7748-21-0 will be cancelled upon implementation of this permit.

ATC conditions 3-9 are included on the proposed permit as conditions 1-7 on the proposed permit.

ATC condition 10 is included on the proposed permit as conditions 8-11 on the proposed permit with the actual differential pressure ranges to be included once the information is established during the startup and provided by the District's Inspector on the Change Order.

ATC conditions 11-16 are included on the proposed permit as conditions 12-17 on the proposed permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for

- temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-7748-21-2
- B. Authorities to Construct No. C-7748-21-1
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(C-7748-21-2)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-7748-21-2

EXPIRATION DATE: 07/31/2020

EQUIPMENT DESCRIPTION:

DRY VEGETABLE PROCESSING OPERATION SERVED BY FOUR BAGHOUSES CONSISTING OF PNEUMATIC CONVEYING SYSTEM; A C4VA SEPARATOR, SIX ACCRODENT ROTARY SEPARATORS VENTED TO A SAUNCO 10-SIFT-100 BAGHOUSE; TWO DRYERS AND ONE BRUSH REELS VENTED TO A MAC 36FRB7 BAGHOUSE; SIX OLIVER GRAVITY SEPARATORS VENTED TO A BUHLER ASFB BAGHOUSE; GRANULE PACKAGING LINE VENTED TO A MAC 36VR7-STY3 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the baghouses serving the vegetable milling operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouses cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
6. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The Saunco 10-SIFT-100 baghouse shall operate at all times with a minimum differential pressure of X inches water column and a maximum differential pressure of X inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The MAC 36FRB7 baghouse shall operate at all times with a minimum differential pressure of X inches water column and a maximum differential pressure of X inches water column [District Rule 2201] Federally Enforceable Through Title V Permit
10. The Buhler ASFB baghouse shall operate at all times with a minimum differential pressure of X inches water column and a maximum differential pressure of X inches water column [District Rule 2201] Federally Enforceable Through Title V Permit
11. The MAC 36VR7-STY3 baghouse shall operate at all times with a minimum differential pressure of X inches water column and a maximum differential pressure of X inches water column [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Each differential operating pressure range shall be monitored and recorded on each day that the baghouses operate. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from the milling operation shall not exceed 0.012 lb-PM10/ton of material processed per baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum product processed rates shall not exceed either of the following limits: 30 ton/day or 8,250 tons/year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily and annual records of the amount of material processed in the vegetable milling operation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct No.
(C-7748-21-1)



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: C-7748-21-1

ISSUANCE DATE: 05/03/2016

LEGAL OWNER OR OPERATOR: OLAM WEST COAST INC
MAILING ADDRESS: 47641 W NEES AVE
FIREBAUGH, CA 93622

LOCATION: 47641 W NEES AVE
FIREBAUGH, CA 93622

EQUIPMENT DESCRIPTION:

DRY VEGETABLE PROCESSING OPERATION SERVED BY FOUR BAGHOUSES CONSISTING OF: PNEUMATIC CONVEYING SYSTEM; A C4VA SEPARATOR, SIX ACCRODENT ROTORY SEPARATORS VENTED TO A SAUNCO 10-SIFT-100 BAGHOUSE; TWO DRYERS AND ONE BRUSH REELS VENTED TO A MAC 36FRB7 BAGHOUSE; SIX OLIVER GRAVITY SEPARATORS VENTED TO A BUHLER ASFB BAGHOUSE; GRANULE PACKAGING LINE VENTED TO A MAC 36VR7-STY3 BAGHOUSE

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Upon implementation of the modification and startup of the equipment authorized by this Authority to Construct (ATC), ATC C-7748-21-0 shall be cancelled. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Visible emissions from the baghouses serving the vegetable milling operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
5. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
6. The baghouses cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
7. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

for

Arnaud Marjollet, Director of Permit Services
C-7748-21-1 May 3 2016 1:16PM - GARCIA Joint Inspection NOT Required

8. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District Rule 2201]
9. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
10. Each differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201]
11. Each differential operating pressure range shall be monitored and recorded on each day that the baghouses operate. [District Rule 2201]
12. Emissions from the milling operation shall not exceed 0.012 lb-PM10/ton of material processed per baghouse. [District Rule 2201]
13. Maximum product processed rates shall not exceed either of the following limits: 30 ton/day or 8,250 tons/year. [District Rule 2201]
14. Permittee shall maintain daily and annual records of the amount of material processed in the vegetable milling operation. [District Rule 2201]
15. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070]

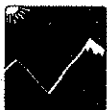
ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-7748-21	0	0	0	0	396
TOTAL	0	0	0	0	396

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



APR 22 2016

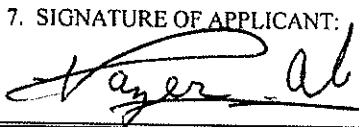
Permit Application For:

Permits Services

☐ ADMINISTRATIVE AMENDMENT

☒ MINOR MODIFICATION

☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Olam West Coast, Inc. – Firebaugh Facility	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>47641 W. Nees Avenue</u> CITY: <u>Firebaugh</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93622</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>47641 W. Nees Avenue</u> CITY: <u>Firebaugh</u> ____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Vegetable Dehydration, Milling, and Packing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) This modification to C-7748-21-0 will add two particulate matter abatement devices (baghouses) to ensure capture and control of particulate matter emissions from milling and packing dried vegetables. There will be no increases in emissions or throughput over that previously specified.	
6. TYPE OR PRINT NAME OF APPLICANT: Nazer Ali	TITLE OF APPLICANT: Director, Environmental Health and Safety
7. SIGNATURE OF APPLICANT: 	DATE: <u>4/22/16</u> PHONE: (559) 256-6235 FAX: (559) 408-7779 EMAIL: nazer.ali@olamnet.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>20.00</u>	CHECK#: <u>Credit Card</u>
	DATE PAID:	
	PROJECT NO: <u>C-1161259</u>	FACILITY ID: <u>C-7748</u>